

INFORMATIONAL LETTER NO. 2183-MC-FFS

DATE: October 22, 2020

TO: Home and Community Based Service (HCBS) Waiver Providers and Case Managers

APPLIES TO: Managed Care (MC) and Fee-for-Service (FFS)

FROM: Iowa Department of Human Services (DHS), Iowa Medicaid Enterprise (IME)

RE: HCBS Waiver Transportation and Supported Community Living (SCL) Services

EFFECTIVE: Upon Receipt

This letter is intended to clarify the Department's policy regarding HCBS waiver transportation and members receiving daily Supported Community Living (SCL) services.

HCBS Waiver Transportation and Daily SCL Services

Transportation services are a stand-alone service available under the Brain Injury (BI), Elderly, Physical Disability (PD) and Intellectual Disability (ID) HCBS waiver programs. Transportation services are activities and expenditures designed to assist the member to travel from one place to another to obtain services or carry out life's activities. HCBS waiver transportation cannot include costs to provide transportation to and from medical appointments funded through the state plan non-emergency medical transportation (NEMT) service. Transportation provides payment for transporting an eligible HCBS waiver member:

- To conduct business errands,
- To conduct essential shopping,
- To and from work or day programs, and
- To reduce social isolation.

Transportation services **may not** be reimbursed when HCBS ID Waiver daily SCL is authorized in a member's service plan. The cost of transportation for the ID Waiver daily SCL service recipient has been included in the daily SCL tiered rates. The ID Waiver daily SCL service provider is responsible for the payment of needed transportation costs

identified in the member's service plan including but not limited to transporting the member:

- To conduct business errands,
- To conduct essential shopping,
- To and from work or day programs, and
- To reduce social isolation.

An ID Waiver daily SCL service provider may not charge an HCBS ID Waiver member for transportation costs which are included in the member's daily SCL tier rate and may not bill for transportation services. This would be considered double billing Medicaid for the same service. A provider may charge a member for nonessential transportation, such as transportation to leisure or community activities, when it is determined by the member's interdisciplinary team that the member has the financial resources to pay the nonessential transportation costs. If a member will be charged for nonessential transportation costs, the provider must have a written policy and procedure that identifies the process for charging a member for transportation services. The member must be informed by the provider of the policy prior to admission for services and annually thereafter. The member's person centered service plan developed by their Case Manager or Community Based Case Manager must identify when a member will be charged for nonessential transportation by a provider.

The ID Waiver daily SCL service cannot include costs to provide transportation to and from medical appointments funded through the state plan NEMT service. SCL providers may need to assist the member in arranging medical transportation with the NEMT broker. The member or their representative must obtain prior authorization from the NEMT broker for transportation to medical appointments.

The BI Waiver daily SCL service providers may include the costs of member specific support services that are directly associated with the provision of SCL services including transportation in the development of the FFS daily SCL rate. The total cost of member specific support services may not exceed \$1,570 reimbursement per member per year. The BI Waiver daily SCL provider must maintain records to support the expenditures.

NEMT and Waiver Transportation Services

NEMT is a Medicaid covered benefit to ensure that Medicaid beneficiaries can get to and from scheduled medical services. The NEMT broker will pay for the cost of transportation and does not pay for the cost of support staff needed to transport the member to medical appointments. SCL providers may provide the staff support for medical transportation as part of the SCL service, but SCL providers may not include the costs of the medical transportation in the rate structure. No medical transportation costs may be included as part of the \$1,570 funds used for SCL rate development or the SCL cost reports.

Coverage of NEMT may be different depending on individual circumstances and needs. NEMT provides for the most economical transportation appropriate to the needs of the

member. NEMT is provided to members eligible for NEMT when those members need transportation to medical, dental or behavioral health or service providers enrolled in the Iowa Medicaid program for the receipt of goods or services covered by the Iowa Medicaid program. NEMT may not be used to transport members to and from HCBS services.

Questions regarding this policy clarification should be addressed with your HCBS Specialist or you may email your questions to hcbswaiver@dhs.state.ia.us.